

2/10/01

7/24/01

33  
ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN,

*Petitioner*

v.

IMMIGRATION and NATURALIZATION  
SERVICE,


*Respondent*

Civil No. 1:01-CV-0168

(Judge Rambo)

**FILED**  
HARRISBURG, PA

JUL 23 2001

MARY E. D'ANDREA, CLERK  
Per  Deputy Clerk

**PETITIONER'S RESPONSE TO COURT ORDER**  
**OF JULY 2, 2001**

AND NOW comes the petitioner, Paul Turpin, by his attorney Daniel I. Siegel of the Federal Public Defender's Office and files this response to the Court's Order of July 2, 2001.

1. By Order dated July 2, 2001, this Court directed undersigned counsel to submit evidence which "demonstrates that [Mr. Turpin's] presence at the moment of removal is assured."
2. Pursuant to the Court's Order, petitioner submits the affidavit of Paul Turpin, attached.

3. Petitioner's affidavit meets the requirements of an unsworn verification under 28 U.S.C. § 1746.

Respectfully submitted,

Date: \_\_\_\_\_

July 23, 2001

Daniel I. Siegel

Daniel I. Siegel, Esquire  
Asst. Federal Public Defender  
100 Chestnut Street, Suite 306  
Harrisburg, PA 17101  
Attorney for Paul Turpin  
Attorney ID #38910



6. I am presently incarcerated at Pike County Jail, H.C. 8 Box 8601, Hawley, Pennsylvania 18423.
7. I have been in INS custody since July 17, 2000.
8. If I am released from INS custody, I will reside with my parents in their home in Brooklyn, New York.
9. If I am released, I will immediately look for employment.
10. I promise that, if released, I will abide by the laws of the United States and the State and City of New York.
11. If released from custody, I will comply with all conditions of release and will report to the INS as directed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: 7-10-01

Paul Turpin  
Paul Turpin

**CERTIFICATE OF SERVICE**

I, Daniel I. Siegel, of the Federal Public Defender's Office do hereby certify that on this date I served a copy of the foregoing **Petitioner's Response to Court Order of July 2, 2001** by hand delivering the same to the following:

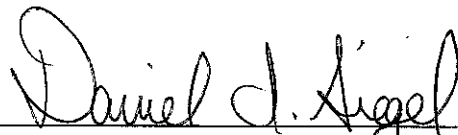
Dulce Donovan, Esquire  
United States Attorney's Office  
Federal Building, Room 217  
228 Walnut Street  
Harrisburg, PA 17108

and by placing the same in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

Paul Turpin  
Pike County Jail  
HC 8, Box 8601  
Hawley, PA 18428

Date:

July 23, 2001



Daniel I. Siegel, Esquire  
Asst. Federal Public Defender  
Attorney for Paul Turpin